

November 26, 2003

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ewaste@calepa.ca.gov

SUBJECT:       Electronic Waste Forum  
                  Public Comment - City of Santa Monica

I was in attendance at the meeting on November 25, and I would like to commend and thank the State for hosting such a valuable public workshop. I appreciate the commitment demonstrated by Senator Sher, Director Lowry, Secretary Hickox, and CIWM Board Member Paparian. As manager of the CUPA and the Household Hazardous Waste (HHW) Programs in the City of Santa Monica, I am also quite involved in the issue. There were many fine statements made at the Workshop but I am writing to add just a few more.

**City Of Santa Monica: E-Waste**

First, I simply want to inform you that the City Of Santa Monica is among the local agencies that are concerned with the nature of any pending resolution and associated legislation. We have had an electronics waste program for more than one year and during this time we too have sought a solution that balances the growing demand for the service, with appropriate management and disposition of the waste, as well as the costs of the service.

**Product Stewardship**

I strongly support an approach that requires product stewardship (or extended producer responsibility) from manufacturers. Although Santa Monica and most local governments accept HHW for free, this need not serve as a precedent for E-Waste.

**Mr. Lowry: The answer is the Tragedy of the Commons**

I find great value in an idea that was first presented nearly 40 years ago, that is 'the tragedy of the commons' as detailed by Garret Hardin. The basis of the idea is that resources that are held in common are easy targets for abuse. The history of land and air are just two examples, but like land and air, government can also be understood as a resource of the commons.

Mr. Lowry asked one panelist why it was inappropriate for local governments to provide the collection services even if manufacturers are funding this waste collection. I suggest that the problem lies in separating the cost of disposal from the cost of purchasing an electronic device. The displacement of the disposal cost translates into the displacement of the responsibility for managing the resulting waste and this is an incentive to find a common resource to absorb that responsibility. This common resource might be a local government collection service or a back alley (which is almost the same thing.)

When a purchase is made it establishes a critical financial and legal relationship among the manufacturer, retailer, and consumer. To ignore the potential of this relationship when developing waste management policies is to miss a great opportunity. When a consumer no longer has the resources that come with this purchasing relationship, he or she is more likely to look for common resources to solve his or her waste disposal problems. A consumer that can

look to the purchasing relationship for assistance with waste management will have less incentive to make demands from a common resource. Concern was raised that any fee be designed to send the right signals to the marketplace. With increasing pressure on all of our resources it is important that these signals be accurate, but complete. Demands on common resources are enormous. Electronic waste is a discrete, voluminous, and costly waste stream and to ask government to absorb the costs of managing this waste stream is an unnecessary use of that common resource. This is an opportunity to send a signal to manufacturers, retailers, and consumers alike that the decisions we all make affect our world. I hope we can minimize our reliance on our common resources in achieving a solution.

Very Sincerely,

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